

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law

100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5500

Rachel Perillo

March 4, 2022

Via ECF & Email

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. Trial in this case is scheduled for April 26, 2022. This letter is respectfully submitted to inform the Court of an unforeseen scheduling conflict and to request, without objection from the government, to postpone trial.

I was previously scheduled to begin trial in *United States v. Christian Pabon*, 18 Cr. 319 (SHS) on May 16, 2022. Yesterday, I was informed by court order that the *Ad Hoc* Committee on the Resumption of Jury Trials has advanced the *Pabon* case to May 2, 2022. See 18 Cr. 319 (SHS) (Dkt. 481). *Pabon* is a murder racketeering case from 2018 and the defendant is incarcerated. Because I am unable to try both of these cases at the same time, it is respectfully requested that trial in the instant matter be postponed. I have conferred with the government, by AUSA Dina McLeod, and if the Court grants this application, the parties are available to try this case at any time from **June 28 through July 22, 2022, or August 29 through September 23, 2022**. Mr. Raji consents to the exclusion of time under the Speedy Trial Act in order to continue plea negotiations as well as trial preparation.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,
/s/
Jeremy Schneider

cc: AUSA Dina McLeod (By ECF & Email)